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6 Plaintiff in Pro Per

7 UNITED STATES DISTRICT COURT
8
9 CENTRAL DISTRICT OF CALIFORNIA

10 MARC WOLSTENHOLME,
11 Plaintiff,
12 vs.
13 RIOT GAMES, INC.,
14 Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

Hon. Fernando M. Olguin

DECLARATION OF MARC
WOLSTENHOLME

PLAINTIFF'S NOTICE OF MOTION AND
MOTION TO FILE EXHIBIT FF UNDER
SEAL

15
16 Dated this: April 06, 2025

M. WOLSTENHOLME

[MARC WOLSTENHOLME]

**PLAINTIFF'S NOTICE OF MOTION AND MOTION TO FILE EXHIBIT
FF UNDER SEAL**

[Local Rule 79-5]

TO THE HONORABLE COURT, DEFENDANT, AND COUNSEL OF
RECORD:

PLEASE TAKE NOTICE that Plaintiff Marc Wolstenholme, appearing pro se, respectfully moves this Court for an order permitting him to file Exhibit FF under seal in connection with his Opposition to Defendant Riot Games, Inc.'s Motion to Dismiss the Second Amended Complaint (SAC).

I. INTRODUCTION

Plaintiff seeks leave to file Exhibit FF (Military Credentials – Expertise in Hidden Content Analysis) under seal pursuant to Local Rule 79-5 and the Court's inherent authority. This exhibit contains sensitive and confidential personal military records demonstrating Plaintiff's formal training in detecting concealed meaning and information, relevant to claims regarding pattern recognition and forensic content analysis in the present case.

II. LEGAL STANDARD

Under C.D. Cal. L.R. 79-5.2.2(b), documents may be filed under seal when they contain information that is privileged, confidential, or otherwise protected from public

1 disclosure. Courts balance the public's right of access against the litigant's interest in
2 confidentiality, particularly when the records at issue involve national security-adjacent military
3 experience, privacy, or sensitive personal data.
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5 6 **III. GOOD CAUSE EXISTS TO SEAL EXHIBIT FF**

7 Exhibit FF contains documentation of the Plaintiff's training and experience in
8 military-intelligence applications, which are not intended for public dissemination. Public filing
9 of these materials may raise privacy risks and security implications, including disclosure of
10 techniques used in concealed content analysis that are not widely public.
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12 Furthermore, the information contained within Exhibit FF may intersect with
13 sensitive matters governed by the Official Secrets Act 1911 (UK), Section 1, which criminalizes
14 unauthorized disclosure or handling of protected military, intelligence, or security-related
15 material. While Plaintiff does not seek to disclose classified information, the nature of the
16 training and documentation involves content and practices developed within restricted or
17 security-cleared military frameworks.
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20 Disclosure of such credentials in open court without proper sealing may risk
21 breaching confidentiality protocols recognized under UK law and applicable bilateral security
22 norms between allied states. In addition to privacy interests, these issues implicate international
23 security obligations, and thus further justify sealed filing under both U.S. protective filing rules
24 and international obligations.
25

1 Moreover, Plaintiff's expertise is directly relevant to countering Riot Games'
2 assertions that Plaintiff's identification of narrative patterns in Arcane is "conspiratorial" or
3 speculative. These credentials bolster Plaintiff's credibility as an expert in narrative and forensic
4 interpretation.
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7 Accordingly, Plaintiff respectfully requests that the Court seal Exhibit FF in the
8 interest of privacy, national sensitivity, and judicial efficiency.
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11 **IV. CONCLUSION**

12 For the foregoing reasons, Plaintiff respectfully requests that the Court grant leave
13 to file Exhibit FF under seal.
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Declaration of Authenticity:

I, Marc Wolstenholme, declare under penalty of perjury that the statements made are true and accurate

Executed on April 06, 2025, in Coventry, England.

Signature: *M. WOLSTENHOLME.*

Marc Wolstenholme

Plaintiff in Pro Per

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